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October 23, 2006

via electronic filing

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: SEIU COPE, FEC ID C00004036
July Monthly Report (6/1/06 to 6/30/06)

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated September 20, 2006. I will address each of the items in your letter in turn:

1) You ask about contributions to Betty Sutton for Congress and if there was an excessive contribution in the Primary Election. There was no excessive contribution as the contribution reported for 6/27/06 was not cashed by the candidate and was reported as voided as of 8/30/06 on the SEIU COPE September monthly report. The July monthly report has been corrected to show that this contribution would have been for the General Election, not the primary, if it had not been voided before being cashed.

2) You ask about contributions to several candidates which may have been made after the elections date.

a) Friends of Dennis Cardoza: the check was issued after the date of the Primary Election and was incorrectly disclosed as a contribution to the Primary Election. The July monthly report has been amended to reflect this as a contribution to the General Election, which is how it was reported by the candidate s committee and remains within the \$5,000 limit.

b) McNeerney for Congress: the payment was made to a vendor after the date of the Primary Election but the in-kind contribution of phone calls were performed prior to the Primary Election date.

c) Friends of Phil Hare: the July monthly report has been amended to show that this contribution was for debt retirement for the special primary held on 6/6 after the winner of the original primary for the IL-17 dropped out of the race. The candidate in the Special Primary did have outstanding debt at the time the contribution was made (6/15/06). The July monthly report has been amended to clarify that this contribution was for the Special Election and not the regularly scheduled Primary Election.

d) Tom Allen for Congress: the check was issued after the date of the Primary Election and was incorrectly disclosed as a contribution to the Primary Election. The July monthly report has been amended to reflect this as a contribution to the General Election, which is how it was reported by the candidate s committee and remains within the \$5,000 limit.

e) Betty Sutton for Congress: As described above, the 6/27/06 contribution was voided on 8/30 and was incorrectly disclosed as a contribution for the Primary Election on the July report. When the void check and reporting correction are considered, it is clear that one contribution of \$5,000 was made in March to the Betty Sutton for Congress campaign for the Primary Election, and a second \$5,000 contribution to the General Election was made in August. No excessive or late contributions were made.

If you have any further questions regarding this mater, please feel free to contact me at
202-730-7465.

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ETEXT ATTACHMENT

Very truly yours,

John J. Sullivan
Associate General Counsel
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE
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